



COASTAL
CONSERVATION
LEAGUE

July 27, 2010

Gina L. Kirkland
SC Department of Health and Environmental Control
Water Quality Standards Coordinator
Bureau of Water
2600 Bull Street
Columbia, SC 29201

Re: 2010 Triennial Review Additional Comments on Notice of Drafting for R. 61-68

The Coastal Conservation League is submitting the following comments regarding South Carolina Regulations R. 61-68, Water Classifications and Standards. Our comments are in response to 2010 Triennial Review under CWA Section 303 (c) (1). The Coastal Conservation League is an environmental advocacy organization focused on the coastal plain of South Carolina with over 4000 members.

Our comments are in the form of questions regarding the numeric criteria of Arsenic found in Appendix R. 61-68.

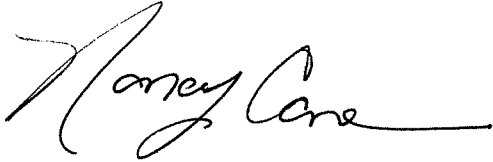
1. What numeric value is the DHEC Bureau of Water using for arsenic in regards to Human Health, For Consumption of Water & Organism and Organism Only?
2. E.14 (c) (5) in the R. 61-68 Appendix states that MCLs for Water and Organism shall be used in establishing permit effluent limitations for human health protection, this section, however, does not mention effluent limitations for the protection of Organism Only. With this lack of clarity in the Appendix for Organism Only numeric water quality criteria for Arsenic, what numeric criteria is the DHEC Bureau of Water using to establish permit effluent limitations regarding Arsenic for Organism Only protection?

Thank you for the opportunity to comment and question the Notice of Drafting for R. 61-68. Please provide me with clarification of the Department's implementation of numeric water quality criteria for Arsenic relating to Water & Organism and Organism Only protection.

"Nature and Community in Balance"

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Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Cave". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nancy Cave
North Coast Office Director
Coastal Conservation League

CC: David Wilson, Chief Bureau of Water
David Baize, Assistant Bureau Chief, Bureau of Water
John Litton, Assistant Bureau Chief, Bureau of Water
Joel Hansel, EPA Region 4, SC Water Quality Standards